

NATALIE K. WIGHT, OSB #035576
United States Attorney
District of Oregon
JUDITH R. HARPER, OSB #903260
Assistant United States Attorney
Judi.Harper@usdoj.gov
310 West Sixth Street
Medford, OR 97501
Telephone: (541) 776-3564
Attorneys for United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:24-cv-01076-MO

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

**17300 RAMSEY ROAD, WHITE CITY,
JACKSON COUNTY, STATE AND
DISTRICT OF OREGON WITH
BUILDINGS, APPURTENANCES,
AND IMPROVEMENTS, 2020 FORD
F-350 PICKUP, VIN #
1FT8W3BT9LEC21971, ITS TOOLS
AND APPURTENANCES, 2010
SNAKE RIVER UTILITY TRAILER,
VIN # 5PTBD1426M1040008, ITS
TOOLS AND APPURTENANCES,
\$6,661.00 U.S. CURRENCY, and
\$56,287.96 U.S. CURRENCY, *in rem*,**

Defendants.

Plaintiff, United States of America, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to

21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

COUNT 1

II.

Defendant, *in rem*, 17300 Ramsey Road, White City, Oregon, with buildings, appurtenances, and improvements, further described as:

TRACT A: A TRACT OF LAND LOCATED IN THE NORTHWEST QUARTER OF SECTION 29, IN TOWNSHIP 34 SOUTH, RANGE 2 WEST OF THE WILLAMETTE MERIDIAN, JACKSON COUNTY, OREGON, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE EASTERLY RIGHT-OF-WAY LINE OF RAMSEY CANYON ROAD (COUNTY ROAD), FROM WHICH THE WEST QUARTER CORNER OF SECTION 29 IN TOWNSHIP 34 SOUTH, RANGE 2 WEST OF THE WILLAMETTE MERIDIAN, JACKSON COUNTY, OREGON BEARS SOUTH 42.03 FEET AND WEST 381.64 FEET; THENCE ALONG SAID EASTERLY RIGHT-OF-WAY LINE OF SAID RAMSEY CANYON ROAD (COUNTY ROAD), ON THE ARC OF A CURVE TO THE RIGHT, HAVING A RADIUS OF 1402.395 FEET, AND A CENTRAL ANGLE OF 08 DEGREES 42' 02" (THE LONG CHORD OF WHICH BEARS NORTH 25 DEGREES 30' 42" EAST, 212.75 FEET) 212.95 FEET; THENCE NORTH 29 DEGREES 51' 43" EAST 310.27 FEET; THENCE LEAVING SAID EASTERLY RIGHT-OF-WAY LINE, SOUTH 89 DEGREES 04' 59" EAST, 971.00 FEET TO A POINT DESIGNATED "A" FOR FUTURE REFERENCE; THENCE CONTINUE SOUTH 89 DEGREES 04' 59" EAST 338.83 FEET TO INTERSECT THE BOUNDARY LINE AGREEMENT RECORDED AS DOCUMENT NO. 77-19474, OFFICIAL RECORDS OF JACKSON COUNTY, OREGON; THENCE, ALONG SAID AGREEMENT LINE, SOUTH 00 DEGREES 13' 22" WEST, 465.00 FEET, TO A 5/8" IRON PIN; THENCE NORTH 89 DEGREES 04' 59" WEST, 1552.93 FEET TO A 5/8" IRON PIN WITNESS CORNER; THENCE CONTINUE NORTH 89 DEGREES 04' 59" WEST, 1.25 FEET, MORE OR LESS, TO THE TRUE POINT OF BEGINNING. EXCEPTING THEREFROM THE FOLLOWING: A TRACT OF LAND LOCATED IN THE NORTHWEST QUARTER OF SECTION 29, IN TOWNSHIP 34 SOUTH, RANGE 2 WEST OF THE WILLAMETTE MERIDIAN, JACKSON COUNTY, OREGON, DESCRIBED AS FOLLOWS: COMMENCING AT A POINT ON THE EASTERLY RIGHT-OF-WAY LINE OF RAMSEY ROAD (COUNTY ROAD), FROM WHICH THE WEST QUARTER CORNER OF SECTION 29, IN TOWNSHIP 34 SOUTH, RANGE 2 WEST OF THE WILLAMETTE MERIDIAN, JACKSON COUNTY, OREGON, BEARS SOUTH 42.03 FEET AND WEST 381.64 FEET; THENCE ALONG SAID EASTERLY RIGHT-OF-WAY LINE OF RAMSEY ROAD (COUNTY ROAD), ON THE ARC OF A CURVE TO THE RIGHT, HAVING A RADIUS OF 1402.395 FEET AND A CENTRAL ANGLE OF 08 DEGREES 42' 02" (THE LONG CHORD OF WHICH BEARS NORTH 25 DEGREES 30' 42" EAST, 212.75 FEET), 212.95 FEET;

THENCE NORTH 29 DEGREES 51' 43" EAST, 310.27 FEET; THENCE LEAVING SAID EASTERLY RIGHT-OF-WAY LINE, SOUTH 89 DEGREES 04' 59" EAST, 654.00 FEET, FOR THE TRUE POINT OF BEGINNING; THENCE CONTINUE SOUTH 89 DEGREES 04' 59" EAST, 187.35 FEET; THENCE SOUTH 00 DEGREES 13' 22" WEST, 465.00 FEET; THENCE NORTH 89 DEGREES 04' 59" WEST, 187.35 FEET; THENCE NORTH 00 DEGREES 13' 22" EAST, 465.00 FEET TO THE TRUE POINT OF BEGINNING.

TRACT B: A TRACT OF LAND LOCATED IN THE NORTHWEST QUARTER OF SECTION 29, TOWNSHIP 34 SOUTH, RANGE 2 WEST, OF WILLAMETTE MERIDIAN, JACKSON COUNTY, OREGON, MORE FULLY DESCRIBED AS FOLLOWS: COMMENCING AT A POINT ON THE EASTERLY RIGHT-OF-WAY LINE OF RAMSEY ROAD (COUNTY ROAD), FROM WHICH THE WEST QUARTER CORNER OF SECTION 29 IN TOWNSHIP 34 SOUTH, RANGE 2 WEST OF THE WILLAMETTE MERIDIAN, JACKSON COUNTY, OREGON, BEARS SOUTH 42.03 FEET AND WEST 381.64 FEET; THENCE ALONG SAID EASTERLY RIGHT-OF-WAY LINE OF RAMSEY ROAD (COUNTY ROAD), ON THE ARC OF A CURVE TO THE RIGHT, HAVING A RADIUS OF 1402.395 FEET TO A CENTRAL ANGLE OF 08 DEGREES 42' 02" (THE LONG CHORD OF WHICH BEARS NORTH 25 DEGREES 30' 42" EAST, 212.75 FEET), 212.95 FEET; THENCE NORTH 29 DEGREES 51' 43" EAST, 310.27 FEET; THENCE LEAVING SAID EASTERLY RIGHT-OF-WAY LINE, SOUTH 89 DEGREES 04' 59" EAST, 654.00 FEET FOR THE TRUE POINT OF BEGINNING; THENCE CONTINUE SOUTH 89 DEGREES 04' 59" EAST, 187.35 FEET; THENCE SOUTH 00 DEGREES 13' 22" WEST, 465.00 FEET; THENCE NORTH 89 DEGREES 04' 59" WEST, 187.35 FEET; THENCE NORTH 00 DEGREES 13' 22" EAST, 465.00 FEET TO THE TRUE POINT OF BEGINNING.

hereinafter referred to as Defendant Real Property, is now and during the pendency of this action will be within the jurisdiction of this Court. Defendant Real Property is located in the State of Oregon, Jackson County.

III.

Defendant, *in rem*, Defendant Real Property represents property that was used or intended to be used to facilitate the illegal production, conversion, and/or distribution of marijuana in violation of 21 U.S.C. § 841, and is forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(7), as more particularly set forth in the declaration of Ryan Miles, Special Agent, Homeland Security Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

COUNT 2

IV.

Defendants, *in rem*, 2020 Ford F-350 pickup, VIN # 1FT8W3BT9LEC21971, its tools and appurtenances, hereinafter referred to as Defendant Truck, 2010 Snake River Utility Trailer, VIN # 5PTBD1426M1040008, its tools and appurtenances, hereinafter referred to as Defendant Trailer, \$6,661.00 U.S. Currency, hereinafter referred to as Defendant Currency 1, and \$56,287.96 U.S. Currency, hereinafter referred to as Defendant Currency 2, were seized in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

V.

Defendants, *in rem*, Defendant Truck, Defendant Trailer, Defendant Currency 1, and Defendant Currency 2 represent property that was used or intended to be used to facilitate the illegal production, conversion, and/or distribution of marijuana, or represents proceeds traceable to an exchange for controlled substances or was intended to be used as such in violation of 21 U.S.C. § 841, and are forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(4) & (6), as more particularly set forth in the declaration of Ryan Miles, Special Agent, Homeland Security Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, Defendant Real Property, et. al.; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be

forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: July 2, 2024.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ *Judith R. Harper*
JUDITH R. HARPER
Assistant United States Attorney

VERIFICATION

I, Ryan Miles, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Homeland Security Investigations and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Ryan Miles
Ryan Miles
Special Agent
Homeland Security Investigations